

# **EXHIBIT B**

**Matthew Shayefar**

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**From:** Matthew Shayefar  
**Sent:** Friday, August 22, 2014 1:48 PM  
**To:** 'William Dunnegan'; Richard Weiss  
**Cc:** Evan Fray-Witzer; Val Gurvits; mgusy@cozen.com; MWeldon@cozen.com  
**Subject:** RE: NJMG v DepositPhotos

Dear Bill,

We acknowledge receipt of New Jersey Media Group's acceptance of DepositPhotos' Rule 68 Offer of Judgment.

I note that the mechanics for when a Rule 68 offer is accepted are as follows: "If, within 14 days after being served, the opposing party serves written notice accepting the offer, either party may then file the offer and notice of acceptance, plus proof of service. The clerk must then enter judgment." Therefore we will be making the appropriate filings with the court.

Thank you for your attention to the foregoing,

Matthew Shayefar

Boston Law Group, PC  
825 Beacon Street, Suite 20 | Newton Centre, MA 02459  
Direct: (617) 928-1806 | Tel: (617) 928-1800 | Fax: (617) 928-1802  
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**From:** William Dunnegan  
**Sent:** Friday, August 22, 2014 7:52 AM  
**To:** Matthew Shayefar; Richard Weiss  
**Cc:** Evan Fray-Witzer; Val Gurvits; [mgusy@cozen.com](mailto:mgusy@cozen.com); [MWeldon@cozen.com](mailto:MWeldon@cozen.com)  
**Subject:** RE: NJMG v DepositPhotos

Matthew,

We accept the offer of judgment. Please confirm your receipt of this e-mail.

We enclose a draft stipulation of dismissal. If this meets with your approval, I suggest that you sign it and return it to me with a check for \$2K payable to my firm as attorney for North Jersey Media Group Inc. I would like to notify the Court that the September 3 appearance should be cancelled.

If you have any questions or concerns, please let me know.

Thanks.

Bill

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**From:** Matthew Shayefar  
**Sent:** Monday, August 18, 2014 7:46 PM  
**To:** William Dunnegan; Richard Weiss

**Cc:** Evan Fray-Witzer; Val Gurvits; [mgusy@cozen.com](mailto:mgusy@cozen.com); [MWeldon@cozen.com](mailto:MWeldon@cozen.com)

**Subject:** NJMG v DepositPhotos

Dear Counsel,

Please find attached DepositPhotos's Offer of Judgment Pursuant to Federal Rule of Civil Procedure 68.

Very truly yours,

Matthew Shayefar

Boston Law Group, PC  
825 Beacon Street, Suite 20 | Newton Centre, MA 02459  
Direct: (617) 928-1806 | Tel: (617) 928-1800 | Fax: (617) 928-1802  
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